

Matthew R. Orr, Bar No. 211097
 morr@calljensen.com
 William P. Cole, Bar No. 186772
 wcole@calljensen.com
 CALL & JENSEN
 A Professional Corporation
 610 Newport Center Drive, Suite 700
 Newport Beach, CA 92660
 Tel: (949) 717-3000
 Fax: (949) 717-3100
 Appearance *Pro Hac Vice*:
 Rakesh M. Amin, Illinois Bar No. 6228751
 rakesh@amintalati.com
 Ryan M. Kaiser, Illinois Bar No. 6269873
 ryan@amintalati.com
 Sanjay S. Karnik, Illinois Bar No. 6300156
 sanjay@amintalati.com
 AMIN TALATI & UPADHYE, LLC
 100 S. Wacker Drive, Suite 2000
 Chicago, IL 60606
 Tel: (312) 327-3382
 Fax: (312) 884-7352

Attorneys for Defendant Nutiva, Inc.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

SHIRIN DELALAT, on behalf of herself, all
 others similarly situated, and the general public,

Plaintiff,

vs.

NUTIVA, INC.,

Defendant.

Case No. 4:16-cv-00711 HSG

**DECLARATION OF L. LISA SANDOVAL IN
 SUPPORT OF DEFENDANT'S OPPOSITION
 TO PLAINTIFF'S MOTION FOR CLASS
 CERTIFICATION**

Date: February 8, 2018
 Time: 2:00 p.m.
 Place: Courtroom 2, 4th Floor

Complaint Filed: January 8, 2016
 Trial Date: None Set

**CALL &
 JENSEN**
EST. 1981

1 I, L. Lisa Sandoval, declare as follows:

2 1. I am an attorney with Call & Jensen, APC. I make this Declaration based on my own
3 personal knowledge and work on this matter. If called as a witness, I could competently testify to the
4 facts stated herein.

5 2. I researched variations in the laws of the 50 states and the District of Columbia
6 regarding consumer protection, implied warranty of merchantability, and express warranty causes of
7 action—the three causes of action on which Plaintiff seeks class certification.

8 3. Attached hereto as Exhibit 1 is a true and correct copy of the chart summarizing
9 variations among the jurisdictions for consumer protection statutes.

10 4. Attached hereto as Exhibit 2 is a true and correct copy of the chart summarizing
11 variations among the jurisdictions for implied warranty of merchantability claims.

12 5. Attached hereto as Exhibit 3 is a true and correct copy of the chart summarizing
13 variations among the jurisdictions for an express warranty claim.

14
15 I declare under penalty of perjury under the laws of the United States of America that the
16 foregoing is true and correct. This declaration was executed on December 1, 2017, at Newport Beach,
17 California.

18
19 /s/ L. Lisa Sandoval
20 L. Lisa Sandoval
21
22
23
24
25
26
27
28

CALL &
JENSEN
EST. 1981

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2017, I electronically filed the foregoing document described as **DECLARATION OF L. LISA SANDOVAL IN SUPPORT OF DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR CLASS CERTIFICATION** with the Clerk of the Court using the CM/ECF System which will send notification of such filing via electronic mail to all counsel of record.

/s/ William P. Cole
William P. Cole